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REMARKS

Claims 1-40 are in the case. Claims 1-18 and 38-40 are objected to and rejected under 35 USC § 112. Claims 1-7, 19-21, 23-25, 29-30, and 38 are rejected under 35 USC § 102, and claims 8-18, 22, 26-28, 31-37, and 40 are rejected under 35 USC § 103. Claims 1-38 and 40 have been amended, and new claim 39 has been added. No new matter has been introduced by the amendments, which are supported by the disclosure of the original claims and the specification. Reconsideration and allowance of the claims are respectfully requested.

DECLARATION OBJECTIONS

The declaration is objected to because the citizenship for co-inventor Mary Albanese was inadvertently omitted from the original declaration. Applicants are attempting to contact Ms. Albanese, so that she can execute a supplemental declaration. However, Ms. Albanese has moved and is no longer employed by the Assignee, and her whereabouts at this time are unknown. It is requested that this objection be held in abeyance for the time being, until Ms. Albanese can be located and the supplemental declaration executed, or alternate arrangements can be made.

CLAIM OBJECTIONS, CLAIM REJECTIONS UNDER §112

All of the claims have been amended to resolve the antecedent basis problems and typographical errors, and to simplify and clarify the language. Because of the large number of such corrections, a detailed description of each is not presented in this section. Applicants have endeavored to resolve all such problems, and kindly request the patience of the examiner should any additional such problems be found.

CLAIM REJECTIONS UNDER §102

Claims 1-7 are rejected under 35 U.S.C. 102 as being unpatentable over Kuo et al. Independent claim 1 claims, *inter alia*, an improved multi-client to multi-server software system having *at least one server process* capable of sending and receiving messages, *at least one client process* capable of sending and receiving messages, and *no more than*

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one control process for passing the messages to and from the server process and the client process, where the server process, the client process, and the control process are *all separate and distinct processes*, and *all messages* between the server process and the client process *are relayed through the control process*.

Kuo et al. do not describe such a software system. First, Kuo et al. describe a single server process, whereas the claimed system can have more than one server process. Second, the server process of Kuo et al. has one or more transaction message control mechanisms for each client process, whereas the claimed system has no more than one control process. Third, the transaction message control mechanisms of Kuo et al. reside within the server process, whereas in the claimed system the control process and the server process are separate and distinct processes, although they may reside on the same hardware platform. Fourth, the client processes of Kuo et al. control the messaging between the server process and the client processes, whereas in the claimed system all messaging between the server process and the client process are controlled by the control process.

Thus, there are four patentable distinctions between the system of Kuo et al. and the present system as claimed, any one of which is sufficient to find the present invention patentable over Kuo et al. Therefore, claim 1 patentably defines over Kuo et al. Reconsideration and allowance of claim 1 are respectfully requested. Dependent claims 2-7 depend from independent claim 1, and contain additional important aspects of the invention. Therefore, dependent claims 2-7 patentably define over Kuo et al. Reconsideration and allowance of dependent claims 2-7 are respectfully requested.

Claims 19-21, 23-25, 29-30, and 38 are rejected under 35 U.S.C. 102 as being unpatentable over Schwaller et al. Independent claim 19 claims, *inter alia*, a server-client computer simulation system with a computer including a processor, memory, and means for I/O, at least one server including a processor, memory, means for I/O, and a *server process* residing in the memory and operating on the processor, at least one client including a processor, memory, means for I/O, and a *client process* residing in the memory and operating on the processor, and a *single control process* residing in the computer memory, the control process acting as a message broker between the server process and the client process, for passing messages between the server process and the

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client process, with *communication between the server process and the client process controlled and directed exclusively by the control process*, the server-client computer simulation system acting to simulate a device in a repeatable manner.

Schwaller et al. do not describe such a system, in that Schwaller et al. describe a multitude of nodes and masters that can communicate directly one with another. Thus, unlike the present system as claimed, Schwaller et al. do not describe a server process, a client process, and a single control process that exclusively controls and directs communication between the server process and the client process.

Therefore, claim 19 patentably defines over Schwaller et al. Reconsideration and allowance of claim 19 are respectfully requested. Dependent claims 20-21 and 23-25 depend from independent claim 19, and contain additional important aspects of the invention. Therefore, dependent claims 20-21 and 23-25 patentably define over Schwaller et al. Reconsideration and allowance of dependent claims 20-21 and 23-25 are respectfully requested.

Independent claim 29 claims, *inter alia*, a method of carrying out a simulation of multiple clients and multiple servers, by running a *plurality of server processes* that each simulate a server, running a *plurality of client processes* that each simulate a client, each of the client processes associated with at least one of the server processes, running a *single control process* that acts as a message broker between the server processes and the client processes, *all messages between the server processes and the client processes managed and controlled by the control process*, and the control process controlling the operation of the server processes, and maintaining an elapsed time of the simulation with the control process.

Schwaller et al. do not describe such a system, in that Schwaller et al. describe a multitude of nodes and masters that can communicate directly one with another. Thus, unlike the present system as claimed, Schwaller et al. do not describe a plurality of server processes, a plurality of client processes, and a single control process that manages and controls all messages between the server processes and the client processes.

Therefore, claim 29 patentably defines over Schwaller et al. Reconsideration and allowance of claim 29 are respectfully requested. Dependent claims 30 and 38 depend from independent claim 29, and contain additional important aspects of the invention.

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Therefore, dependent claims 30 and 38 patentably define over Schwaller et al. Reconsideration and allowance of dependent claims 30 and 38 are respectfully requested.

CLAIM REJECTIONS UNDER §103

Dependent claims 8-11 and 16-18 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kuo et al. in view of Baker et al. Dependent claims 8-11 and 16-18 depend from independent claim 1, and therefore claims *inter alia*, an improved multi-client to multi-server software system having *at least one server process* capable of sending and receiving messages, *at least one client process* capable of sending and receiving messages, and *no more than one control process* for passing the messages to and from the server process and the client process, where the server process, the client process, and the control process are *all separate and distinct processes*, and *all messages* between the server process and the client process *are relayed through the control process*.

The deficiencies of Kuo et al. in regard to this combination of elements are described at length above. Baker et al. do not compensate for the deficiencies of Kuo et al., in that Baker et al. also do not describe more than one server process, no more than one control process, where the control process and the server process are separate and distinct processes, and where all messaging between the server process and the client process are controlled by the control process.

Thus, claims 8-11 and 16-18 patentably define over Kuo et al. in view of Baker et al. Reconsideration and allowance of claims 8-11 and 16-18 are respectfully requested.

Dependent claims 12-13 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kuo et al. in view of Baker et al., and further in view of Willmann et al. Dependent claims 12-13 depend from independent claim 1, and therefore claim *inter alia*, an improved multi-client to multi-server software system having *at least one server process* capable of sending and receiving messages, *at least one client process* capable of sending and receiving messages, and *no more than one control process* for passing the messages to and from the server process and the client process, where the server process, the client process, and the control process are *all separate and distinct processes*, and *all*

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messages between the server process and the client process *are relayed through the control process*.

The deficiencies of Kuo et al. and Baker et al. in regard to this combination of elements are described at length above. Willmann et al. do not compensate for the deficiencies of Kuo et al. in view of Baker et al., in that Willmann et al. also do not describe more than one server process, no more than one control process, where the control process and the server process are separate and distinct processes, and where all messaging between the server process and the client process are controlled by the control process.

Thus, claims 12-13 patentably define over Kuo et al. in view of Baker et al. and further in view of Willmann et al. Reconsideration and allowance of claims 12-13 are respectfully requested.

Dependent claims 14-15 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kuo et al. in view of Wegrzyn. Dependent claims 14-15 depend from independent claim 1, and therefore claim *inter alia*, an improved multi-client to multi-server software system having *at least one server process* capable of sending and receiving messages, *at least one client process* capable of sending and receiving messages, and *no more than one control process* for passing the messages to and from the server process and the client process, where the server process, the client process, and the control process are *all separate and distinct processes*, and *all messages* between the server process and the client process *are relayed through the control process*.

The deficiencies of Kuo et al. in regard to this combination of elements are described at length above. Wegrzyn does not compensate for the deficiencies of Kuo et al., in that Wegrzyn also does not describe more than one server process, no more than one control process, where the control process and the server process are separate and distinct processes, and where all messaging between the server process and the client process are controlled by the control process.

Thus, claims 14-15 patentably define over Kuo et al. in view of Wegrzyn. Reconsideration and allowance of claims 14-15 are respectfully requested.

Claim 22 is rejected under 35 U.S.C. 103 as being unpatentable over Schwaller et al. in view of Gee. Dependent claim 22 depends from independent claim 19, and

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therefore claims *inter alia*, a server-client computer simulation system with a computer including a processor, memory, and means for I/O, at least one server including a processor, memory, means for I/O, and a *server process* residing in the memory and operating on the processor, at least one client including a processor, memory, means for I/O, and a *client process* residing in the memory and operating on the processor, and a *single control process* residing in the computer memory, the control process acting as a message broker between the server process and the client process, for passing messages between the server process and the client process, with *communication between the server process and the client process controlled and directed exclusively by the control process*, the server-client computer simulation system acting to simulate a device in a repeatable manner.

The deficiencies of Schwaller et al. in regard to this combination of elements are described at length above. Gee does not compensate for the deficiencies of Schwaller et al., in that Gee also does not describe a server process, a client process, and a single control process that exclusively controls and directs communication between the server process and the client process.

Therefore, claim 22 patentably defines over Schwaller et al. in view of Gee. Reconsideration and allowance of claim 22 are respectfully requested.

Claim 26 is rejected under 35 U.S.C. 103 as being unpatentable over Schwaller et al. in view of Iwasawa et al. and further in view of Alferness et al. Dependent claim 26 depends from independent claim 19, and therefore claims *inter alia*, a server-client computer simulation system with a computer including a processor, memory, and means for I/O, at least one server including a processor, memory, means for I/O, and a *server process* residing in the memory and operating on the processor, at least one client including a processor, memory, means for I/O, and a *client process* residing in the memory and operating on the processor, and a *single control process* residing in the computer memory, the control process acting as a message broker between the server process and the client process, for passing messages between the server process and the client process, with *communication between the server process and the client process controlled and directed exclusively by the control process*, the server-client computer simulation system acting to simulate a device in a repeatable manner.

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The deficiencies of Schwaller et al. in regard to this combination of elements are described at length above. Iwasawa et al. and Alferness et al. do not compensate for the deficiencies of Schwaller et al., in that Iwasawa et al. and Alferness et al. also do not describe a server process, a client process, and a single control process that exclusively controls and directs communication between the server process and the client process.

Therefore, claim 26 patentably defines over Schwaller et al. in view of Iwasawa et al. and further in view of Alferness et al. Reconsideration and allowance of claim 26 are respectfully requested.

Claim 27 is rejected under 35 U.S.C. 103 as being unpatentable over Schwaller et al. in view of Baker et al. Dependent claim 27 depends from independent claim 19, and therefore claims *inter alia*, a server-client computer simulation system with a computer including a processor, memory, and means for I/O, at least one server including a processor, memory, means for I/O, and a *server process* residing in the memory and operating on the processor, at least one client including a processor, memory, means for I/O, and a *client process* residing in the memory and operating on the processor, and a *single control process* residing in the computer memory, the control process acting as a message broker between the server process and the client process, for passing messages between the server process and the client process, with *communication between the server process and the client process controlled and directed exclusively by the control process*, the server-client computer simulation system acting to simulate a device in a repeatable manner.

The deficiencies of Schwaller et al. in regard to this combination of elements are described at length above. Baker et al. do not compensate for the deficiencies of Schwaller et al., in that Baker et al. also do not describe a server process, a client process, and a single control process that exclusively controls and directs communication between the server process and the client process.

Therefore, claim 27 patentably defines over Schwaller et al. in view of Baker et al. Reconsideration and allowance of claim 27 are respectfully requested.

Claim 28 is rejected under 35 U.S.C. 103 as being unpatentable over Kuo et al. in view of Schwaller et al. and further in view of Baker et al. and further yet in view of Willmann et al. Dependent claim 28 depends from independent claim 19, and therefore

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claims *inter alia*, a server-client computer simulation system with a computer including a processor, memory, and means for I/O, at least one server including a processor, memory, means for I/O, and a *server process* residing in the memory and operating on the processor, at least one client including a processor, memory, means for I/O, and a *client process* residing in the memory and operating on the processor, and a *single control process* residing in the computer memory, the control process acting as a message broker between the server process and the client process, for passing messages between the server process and the client process, with *communication between the server process and the client process controlled and directed exclusively by the control process*, the server-client computer simulation system acting to simulate a device in a repeatable manner.

The deficiencies of Schwaller et al. in regard to this combination of elements are described at length above. Kuo et al., Baker et al., and Willmann et al. do not compensate for the deficiencies of Schwaller et al., in that they also do not describe a server process, a client process, and a single control process that exclusively controls and directs communication between the server process and the client process.

Therefore, claim 28 patentably defines over Kuo et al. in view of Schwaller et al. and further in view of Baker et al. and further yet in view of Willmann et al. Reconsideration and allowance of claim 28 are respectfully requested.

Claims 31-32 are rejected under 35 U.S.C. 103 as being unpatentable over Kuo et al. in view of Schwaller et al. and further in view of Willmann et al. Dependent claims 31-32 depend from independent claim 29, and therefore claim *inter alia*, a method of carrying out a simulation of multiple clients and multiple servers, by running a *plurality of server processes* that each simulate a server, running a *plurality of client processes* that each simulate a client, each of the client processes associated with at least one of the server processes, running a *single control process* that acts as a message broker between the server processes and the client processes, *all messages between the server processes and the client processes managed and controlled by the control process*, and the control process controlling the operation of the server processes, and maintaining an elapsed time of the simulation with the control process.

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The deficiencies of Schwaller et al. in regard to this combination of elements are described at length above. Kuo et al. and Willmann et al. do not compensate for the deficiencies of Schwaller et al., in that they also do not describe a plurality of server processes, a plurality of client processes, and a single control process that manages and controls all messages between the server processes and the client processes.

Therefore, claims 31-32 patentably define over Kuo et al. in view of Schwaller et al. and further in view of Willmann et al. Reconsideration and allowance of claims 31-32 are respectfully requested.

Claim 33 is rejected under 35 U.S.C. 103 as being unpatentable over Kuo et al. in view of Schwaller et al. and further in view of Willmann et al. and further yet in view of official notice. Dependent claim 33 depends from independent claim 29, and therefore claims *inter alia*, a method of carrying out a simulation of multiple clients and multiple servers, by running a ***plurality of server processes*** that each simulate a server, running a ***plurality of client processes*** that each simulate a client, each of the client processes associated with at least one of the server processes, running a ***single control process*** that acts as a message broker between the server processes and the client processes, ***all messages between the server processes and the client processes managed and controlled by the control process***, and the control process controlling the operation of the server processes, and maintaining an elapsed time of the simulation with the control process.

The deficiencies of Schwaller et al. in regard to this combination of elements are described at length above. Kuo et al., Willmann et al., and official notice do not compensate for the deficiencies of Schwaller et al., in that they also do not describe a plurality of server processes, a plurality of client processes, and a single control process that manages and controls all messages between the server processes and the client processes. Applicants further assert that it is improper to take official notice of the stated elements, and that the references are improperly combined, all of which are discussed in greater detail in the following section.

Therefore, claim 33 patentably defines over Kuo et al. in view of Schwaller et al. and further in view of Willmann et al. and further yet in view of official notice. Reconsideration and allowance of claim 33 are respectfully requested.

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Claims 34-35 are rejected under 35 U.S.C. 103 as being unpatentable over Schwaller et al. in view of Gee. Dependent claims 34-35 depend from independent claim 29, and therefore claim *inter alia*, a method of carrying out a simulation of multiple clients and multiple servers, by running a ***plurality of server processes*** that each simulate a server, running a ***plurality of client processes*** that each simulate a client, each of the client processes associated with at least one of the server processes, running a ***single control process*** that acts as a message broker between the server processes and the client processes, ***all messages between the server processes and the client processes managed and controlled by the control process***, and the control process controlling the operation of the server processes, and maintaining an elapsed time of the simulation with the control process.

The deficiencies of Schwaller et al. in regard to this combination of elements are described at length above. Gee does not compensate for the deficiencies of Schwaller et al., in that Gee also does not describe a plurality of server processes, a plurality of client processes, and a single control process that manages and controls all messages between the server processes and the client processes.

Therefore, claims 34-35 patentably define over Schwaller et al. in view of Gee. Reconsideration and allowance of claims 34-35 are respectfully requested.

Claim 36 is rejected under 35 U.S.C. 103 as being unpatentable over Kuo et al. in view of Schwaller et al. and further in view of Willmann et al. and further yet in view of Gee and further still in view of official notice. Dependent claim 36 depends from independent claim 29, and therefore claims *inter alia*, a method of carrying out a simulation of multiple clients and multiple servers, by running a ***plurality of server processes*** that each simulate a server, running a ***plurality of client processes*** that each simulate a client, each of the client processes associated with at least one of the server processes, running a ***single control process*** that acts as a message broker between the server processes and the client processes, ***all messages between the server processes and the client processes managed and controlled by the control process***, and the control process controlling the operation of the server processes, and maintaining an elapsed time of the simulation with the control process.

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The deficiencies of Schwaller et al. in regard to this combination of elements are described at length above. Kuo et al., Willmann et al., Gee, and official notice do not compensate for the deficiencies of Schwaller et al., in that they also do not describe a plurality of server processes, a plurality of client processes, and a single control process that manages and controls all messages between the server processes and the client processes. Applicants further assert that it is improper to take official notice of the stated elements, and that the references are improperly combined, all of which are discussed in greater detail in the following section.

Therefore, claim 36 patentably defines over Kuo et al. in view of Schwaller et al. and further in view of Willmann et al. and further yet in view of Gee and further still in view of official notice. Reconsideration and allowance of claim 36 are respectfully requested.

Claim 37 is rejected under 35 U.S.C. 103 as being unpatentable over Kuo et al. in view of Schwaller et al. and further in view of Willmann et al. and further more in view of Wegrzyn and further yet in view of Gee and further still in view of official notice. As an aside, this is the first time that applicants have seen a claim rejected as being obvious over a combination of *FIVE* references, *AND* official notice, and suggest that such a lengthy combination is probably *de facto* impermissible, and not an obvious combination, even if the combination is permissible. Nevertheless, applicants address the specific combination below.

Dependent claim 37 depends from independent claim 29, and therefore claims *inter alia*, a method of carrying out a simulation of multiple clients and multiple servers, by running a *plurality of server processes* that each simulate a server, running a *plurality of client processes* that each simulate a client, each of the client processes associated with at least one of the server processes, running a *single control process* that acts as a message broker between the server processes and the client processes, *all messages between the server processes and the client processes managed and controlled by the control process*, and the control process controlling the operation of the server processes, and maintaining an elapsed time of the simulation with the control process.

The deficiencies of Schwaller et al. in regard to this combination of elements are described at length above. Kuo et al., Willmann et al., Wegrzyn, Gee, and official notice

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do not compensate for the deficiencies of Schwaller et al., in that they also do not describe a plurality of server processes, a plurality of client processes, and a single control process that manages and controls all messages between the server processes and the client processes. Applicants further assert that it is improper to take official notice of the stated elements, and that the references are improperly combined, all of which are discussed in greater detail in the following section.

Therefore, claim 37 patentably defines over Kuo et al. in view of Schwaller et al. and further in view of Willmann et al. and further more in view of Wegrzyn and further yet in view of Gee and further still in view of official notice. Reconsideration and allowance of claim 37 are respectfully requested.

Claim 40, and presumably new claim 39, are rejected under 35 U.S.C. 103 as being unpatentable over Schwaller et al. in view of Baker et al. Independent claim 39 claims, *inter alia*, a simulator apparatus having ***at least one*** first means for sending and receiving messages in a computer system, the first means for sending and receiving messages acting as a ***server process***, ***at least one*** second means for sending and receiving messages in a computer system, the second means for sending and receiving messages acting as a ***client process***, and ***a single*** third means for sending and receiving messages between the server process and the client process, the third means for sending and receiving messages acting as a ***message broker*** between the server process and the client process, and the third means for sending and receiving messages ***adapted to stop the server process and the client process*** at predetermined points in time that are designated as synchronization points, wherein the server process, the client process, and the message broker are all ***separate and distinct processes***, and ***all messages between the server process and the client process are controlled by and relayed through the message broker***, wherein the server process, the client process and the message broker act as a simulator performing a repeatable simulation.

The deficiencies of Schwaller et al. and Baker et al. in regard to this combination of elements are described at length above. Therefore, claim 39 patentably defines over Schwaller et al. in view of Baker et al. Reconsideration and allowance of claim 39 are respectfully requested. Dependent claim 40 depends from independent claim 39, and claims additional important aspects of the invention. Therefore, claim 40 patentably

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defines over Schwaller et al. in view of Baker et al. Reconsideration and allowance of claim 40 are respectfully requested.

COMBINATION OF REFERENCES

The present claims are directed toward a novel client-server simulation system, which uses a server process and a client process that are controlled by a control process. Not only does all communication between the server process and the client process go through the control process, but the control process can pause or stop both the server process and the client process, such as by using synchronization points. In this manner, a distributed system can be made to simulate an actual server and client.

Thus, the claims recite certain steps or elements in combination. Applicants do not at this time assert the claim that any one of these steps or elements, taken by itself, is novel and has never before been seen. Thus, applicants anticipate that it might be possible to find each and every step or element somewhere in the prior art. Even so, applicants assert that they have combined these possibly-known steps and elements in a novel and nonobvious manner to produce a process that has great benefits.

The examiner has selected a set of prior art references, which arguably contain the steps or elements as recited in the present claims. However, the steps and elements selected by the examiner are used in combination with many other steps and elements that are not used in the present claims. The examiner has selectively extracted from the cited references only those steps and elements that are common with the present claims, and has rearranged those selected steps and elements in a manner where they align to some degree with the presently claimed steps and elements. The question must be answered, "what was obvious about selecting that special set of steps and elements from the prior art?" This question has not been answered.

What the examiner has not done, and what the examiner must do, is provide proper motivation for making the selection and combination of prior art steps and elements. Applicants assert that without the proper motivation, the combination of steps and elements as recited by the examiner is not obvious. As noted above, the mere fact that various steps and elements *could be* placed in combination is not a sufficient motivation for actually making the combination. An infinite number of different steps

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and elements *could be* placed in combination, but in order to make the present combination obvious, there must be an allowable motivation to make the combination.

Thus, it is respectfully submitted that the references cited do not support combining the elements as claimed in the present invention. *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d (BNA) 1566 (Fed. Cir. 1990) states that the PTO erred in rejecting a claimed invention as an obvious combination of the teaching of prior art references when the prior art provided no teaching, suggestion, or incentive supporting the combination. *See Northern Telecom Inc. v. Datapoint Corp.*, 15 U.S.P.Q.2d 1321, 1323, *In re Geiger*, 2 U.S.P.Q.2D 1276, 1278. *SmithKline Diagnostics, Inc. v. Helena Laboratories Corp.*, 859 F.2d 878, 887, 8 U.S.P.Q.2d (BNA) 1468, 1475 (Fed. Cir.1988) states that one "cannot pick and choose among the individual elements of assorted prior art references to recreate the claimed invention."

There is nothing in the prior art cited to lead a person of ordinary skill to design an apparatus like that of the present invention, other than the hindsight knowledge of this invention. The office action recites certain generalized benefits (realized in hindsight after considering the invention) as motivation for the combination of the references. However, these generalized motivations do not make obvious the combination of the references to produce the claimed invention. Only after considering the invention is it understood that combining the references (and adding a great deal more) tends to produce the motivating elements.

This, however, does not satisfy Section 103. The motivation to combine references cannot come from the invention itself. *See In re Oetiker*, 24 U.S.P.Q.2D 1443, 1446. The claims of the present application appear to have been used as a frame, and individual parts of separate prior art references were employed to recreate a facsimile of the claimed invention. *See W.L. Gore & Assoc., Inc. v. Garlock, Inc.*, 220 U.S.P.Q. 303, 312. There is no explanation of what there was in the prior art that would have caused those skilled in the art to combine the references.

The examiner has the burden to show some teaching or suggestion in the references to support their use in the particular claimed combination. *Uniroyal Inc. v. Rudkin-Wiley Corp.*, 5 U.S.P.Q.2D at 1438-1439. In the absence of such, applicants respectfully suggest that the references are improperly combined.

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CONCLUSION

Applicants assert that the claims of the present application patentably define over the prior art made of record and not relied upon for the same reasons as given above. Applicants respectfully submit that a full and complete response to the office action is provided herein, and that the application is now fully in condition for allowance. Action in accordance therewith is respectfully requested.

In the event this response is not timely filed, applicants hereby petition for the appropriate extension of time and request that the fee for the extension be charged to deposit account 12-2355. If other fees are required by this amendment, such as fees for additional claims, such fees may be charged to deposit account 12-2252. Should the examiner require further clarification of the invention, it is requested that s/he contact the undersigned before issuing the next office action.

Sincerely,

LUEDEKA, NEELY & GRAHAM, P.C.

By: 

Rick Barnes, 39,596

2005.01.06